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1 A. No.

2 Q. Is there any reason you can think of why you
3 would not be able to understand and answer my questions
4 truthfully today?

5 A. No.

6 Q. Did you review any documents that refreshed your
7 recollection in advance of this deposition?

8 A. No.

9 Q. Have you been or are you currently a plaintiff or
10 a defendant in any other lawsuits?

11 A. No.

12 Q. Have you previously been a plaintiff or a
13 defendant in any other lawsuits?

14 A. Yes.

15 Q. And what lawsuits are those?

16 A. Yes.

17 Q. And what lawsuits are those?

18 A. That was with the City of New York with -- it was
19 five employees, counting myself, and there was one -- part
20 of my injury, which was -- which was a lawsuit with the
21 third party -- City was third party, in front of the
22 building in which I fell.

23 Q. And when -- were you the only plaintiff in that
24 lawsuit, or were there other plaintiffs?

25 A. Which one? The one in front of the building?

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1 Q. Are there multiple lawsuits that you have been a
2 party to?

3 A. There was two, which is the same -- it was all
4 with -- the City of New York was also there, as well.

5 Q. Okay. So relating to the injury lawsuit, when
6 was that filed?

7 A. I don't recall.

8 The date of injury was 2/27. I'm pretty sure the
9 City has it, because they were there. You should have all
10 of that information.

11 Q. You said February 27th?

12 A. That is correct.

13 That was the date of injury, and that's -- that's
14 because it was multiple surgeries, right, so the City --
15 they wanted -- I guess they wanted whatever -- any money I
16 received, they would be able to get back for the money that
17 they spent on my injuries.

18 Q. What -- I'm sorry.

19 Just to clarify, you were the plaintiff in this
20 action; is that correct?

21 A. Correct.

22 Q. And you're saying that the City was getting money
23 from you that had been paid out for your injuries?

24 A. No. Because it happened on the job, it was
25 on-the-job injury, so any moneys that was -- that were

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1 given to me, they were going to, I believe, get a -- I
2 don't know the actual number because of -- because they
3 paid for all of the surgery, physical therapy, so which
4 they did receive the money.

5 Q. Okay. Would that lawsuit have been filed around
6 2015, 2016; does that sound right to you?

7 A. '16, I believe.

8 Q. Okay. And you said that there was another
9 lawsuit.

10 A. Do you remember when that lawsuit was filed?

11 A. I don't remember the date.

12 Q. Okay.

13 A. That was in the Eastern District.

14 Q. And what was the subject of that lawsuit?

15 A. Discrimination.

16 Q. Okay. Do you believe that matter was filed in
17 2011, 2012, somewhere around there, or do you think it was
18 later?

19 A. MR. BARRETT: Objection.

20 A. THE WITNESS: Okay.

21 Q. Do you believe it was filed before or after 2011?

22 A. It's the matter with Seabrook versus City of New
23 York. I know that's the lawsuit we're talking about. I
24 don't recall the date, but that's the lawsuit.

25 Q. Okay. So you don't recall when that lawsuit was